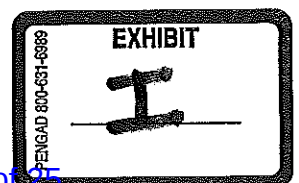


STEPANIE CREEK POUNDS



1 Q. Now, let's talk about E: Using the public
2 offices held by Defendant Daniel and Defendant
3 Williams to conspire to do favors for friends and
4 others to the detriment of Plaintiff Michael R.
5 Anderson. Do you see that?

6 A. Uh-huh.

7 Q. Now, did you have any knowledge of this and
8 tell Mr. Anderson? Did you have personal knowledge
9 of this?

10 A. I had heard Monica talk about doing favors,
11 but not any details that I could -- you know, I
12 couldn't tell Mike any details.

13 Q. Well, what kind of favors? Bad things?
14 Criminal things?

15 A. Tickets, mostly.

16 Q. Like what?

17 A. Traffic tickets.

18 Q. And what would she say?

19 A. Just that she would help them out. I don't
20 know what that meant for her, but.

21 Q. What did that mean to you? What did you
22 think she meant?

23 A. Well, not file it.

24 Q. And can you tell me some of these names?

25 A. No, I don't remember any specific names

1 that she told me.

2 Q. So as far as E, you did supply some
3 information to Mr. Anderson. Is that what you're
4 saying?

5 A. I told him that I had heard her talking
6 about it maybe over the phone or stuff, but I never
7 knew any specific details, you know, because I just
8 started. I didn't know how you hid evidence. Or
9 that when the tickets came by the state patrol, that
10 Monica filed charges and then they went to court. I
11 didn't know all how that worked when I got started.

12 Q. And when did you tell Mr. Anderson about
13 this?

14 A. I believe that was after she got fired,
15 when we all sat down and talked.

16 Q. And before she came back?

17 A. Yeah, I believe so.

18 Q. Now, when you said, "When we all sat down
19 and talked," when are you talking about?

20 A. Well, in December, when all this happened,
21 when Monica got fired, there was a lot of tension in
22 our office, you know. You have something like that
23 go on in your office, it kind of upset the balance of
24 things.

25 So, you know, Mike told us if we had

1 A. Uh-huh.

2 Q. Did you tell Mr. Anderson that that was
3 going on?

4 A. I really don't understand what it means,
5 "From the public offices to coordinate and
6 orchestrate a swinger-style sex ring." Monica was a
7 swinger, but I don't know her and Millie used the
8 offices to set it up.

9 Q. So that I'm clear, did you tell Mr.
10 Anderson prior to December of 2005 that Monica was a
11 swinger?

12 A. After she was fired, yeah, I told him some
13 stuff.

14 Q. You didn't tell him before she was fired?

15 A. No, because it was personal. It didn't
16 happen in the office.

17 Q. Okay. So what your knowledge of Monica
18 being a swinger did not happen in the Texas County
19 Prosecuting Attorney's Office; is that right?

20 A. Not with me. I never seen it.

21 Q. Okay. Well, what did you tell him as to
22 how Millie Williams and Monica conspired to
23 coordinate and orchestrate a swinger-style sex ring?

24 A. I never told him anything about that,
25 because I don't know anything from the public offices

1 to coordinate and orchestrate.

2 Q. What did you tell Mr. Anderson about Millie
3 Williams and Monica?

4 A. The personal thing that had happened.

5 Q. And when did this personal thing happen?

6 A. I don't know the exact date, but it was
7 when I worked there.

8 Q. It was while you were working in 2005?

9 A. Yeah.

10 Q. Okay.

11 A. Well, no, it was while I was working. I
12 don't know if it was in -- yeah, it would be -- okay,
13 yeah, you're right. My first year there was 2005.

14 Q. Okay. So it happened while you were
15 working in 2005?

16 A. That's correct, but not in the office.

17 Q. Okay. And so your testimony is that
18 something personal happened with you and Monica prior
19 to 2005?

20 A. Uh-huh.

21 Q. I mean, after January 1, 2005?

22 A. Uh-huh.

23 Q. And what was that?

24 A. At Monica's house, we -- my husband and I
25 were there and Millie was there.

1 Q. I'm sorry, which husband?
2 A. Carl Creek.
3 Q. Okay.
4 A. And my husband had sex with all of us.
5 Q. Are we talking serially? Or what are we
6 talking about?
7 A. What do you mean "serially"?
8 Q. One at a time in a bedroom. All at the
9 same time in the same room.
10 A. Yeah, we were all in the same room.
11 Q. Okay.
12 A. I don't really want to get into the
13 specifics of who did what, but he had sex with
14 everybody that day.
15 Q. And you were present?
16 A. Yeah, I was present.
17 Q. And this is with your consent?
18 A. Yeah. Not something I'm proud of.
19 Q. Did you have sex with either of the women?
20 A. Oh, my gosh, is this going to come out in
21 court where my kids are all going to know?
22 MR. HARRIS: Can we agree that at
23 least for the purpose of this, this could be sealed.
24 I mean, this is obviously fairly --
25 THE WITNESS: I've got young kids.

1 MR. STEELMAN: If you are telling her
2 that you're not going to try to introduce this into
3 evidence, then we might be able to make a record.

4 MR. HARRIS: No, I'm not telling her
5 that.

6 MR. STEELMAN: Well, then, you're not
7 being completely candid with her. You are wanting to
8 introduce this into evidence --

9 MR. HARRIS: No.

10 MR. STEELMAN: -- in a public hearing
11 and telling her all the efforts you'll go to to make
12 it not public.

13 MR. HARRIS: I'm not going to run out
14 and take it to the Houston Herald or put it on the
15 internet, as has been known to happen in this case.

16 MR. STEELMAN: I'm not going to do
17 that, either.

18 MR. HARRIS: Okay, that's all I'm
19 talking about.

20 MR. STEELMAN: It just sounded to me,
21 to be honest, you're being a little disingenuous,
22 because we all know you're going to try to put it
23 into evidence.

24 BY MR. STEELMAN:

25 A. I think I can solve this right now, all

1 right? I've all ready asked God to forgive me for
2 this. I have told my boys there's some stuff going
3 to come out and my boys and my husband right now are
4 the only one that I answer to, and God.

5 Yes, I had sex with Monica. My husband did
6 me when I was having sex with Monica. He had sex
7 with Monica all in the same bed. And Millie was in
8 the other bed, in the same room, and then he went
9 over and he had oral sex and regular sex with Millie.

10 Q. Okay. And can you tell me about the date
11 of this?

12 A. No.

13 Q. Approximately?

14 A. No, I don't. The times in my head are
15 messed up. I have fibromyalgia. I have diabetes. I
16 used to have a photographic memory; I don't have that
17 now.

18 Q. Here's what I'm asking. Could this have
19 occurred before you went to work in January of 2005?

20 A. No. I had sexual relations with Monica and
21 my husband before 2005, before I started working
22 there.

23 Q. Okay.

24 A. And then when I was working there, that's
25 when he had sex with all of us, with Millie.

1 something about Carl and Millie and Monica and me. I
2 don't know how it popped out. Truly, I don't. I
3 don't know why I said it.

4 Q. And who else have you told that to?

5 A. Who else have I told that to?

6 Q. Yeah.

7 A. Christie.

8 Q. When did you tell Christie?

9 A. We told her as soon as it happened.

10 Q. Okay.

11 A. Monica brags about everything.

12 Q. Okay.

13 A. And then I didn't want Terry to know and I
14 told her a few months ago. And she's like, "Oh, I
15 already know that because Monica came to me and said
16 Millie and Carl were out of line."

17 Q. And then who else have you told this to?

18 A. My husband.

19 Q. And when did you tell your husband?

20 A. Before we got married.

21 Q. And when did you all get married?

22 A. June.

23 Q. Okay. Is there anything else -- we got off
24 on a little sidetrack. Is there anything you told
25 Mr. Anderson about the swinger-style sex ring run out

1 Q. What type of things would she wear that
2 weren't appropriate, in your opinion?

3 A. Well, her jeans, when she would bend over,
4 you could see her thong. Low cut shirts, tight
5 clothes.

6 Q. You mentioned earlier someone coming in
7 that she would ask to change her belly button ring;
8 is that right?

9 A. Yes, sir.

10 Q. Who was that?

11 A. Glen Buckner.

12 Q. Who was Mr. Buckner?

13 A. He used to work for the sheriff's office,
14 but at the time that he was coming into the office,
15 he was, I think, a forester, a forest ranger,
16 something like that. Works with the forestry
17 service.

18 Q. Did you ever see her interact with the
19 highway patrolmen that would come into the office?

20 A. Uh-huh.

21 Q. How would she interact with the highway
22 patrolmen?

23 A. Very flirty, touchy/feely. I've seen her
24 slap one of them on the butt. I don't remember who
25 that was, though. Very touchy/feely. Very friendly.

1 about sex?

2 A. No.

3 Q. Did you ever see Mr. Anderson do anything
4 in which you felt created an atmosphere in a work
5 environment that was not good?

6 A. No.

7 Q. Did you ever see him, in any way, make any
8 kind of sexual comments or propositions or anything
9 like that to Monica?

10 A. No.

11 Q. And I think you talked about this earlier.
12 You said that Monica would talk about Mr. Anderson
13 when he wasn't present?

14 A. Right.

15 Q. Did she show a general respect or
16 disrespect for him when he wasn't around?

17 A. Disrespect.

18 Q. Now, you mentioned earlier, when Mr.
19 Steelman was asking you questions, you said that
20 Monica was a swinger. What did you mean by that?

21 A. She liked girls and guys.

22 Q. How do you know that?

23 A. Monica's birthday is the day after
24 Valentine's Day and it was a very big production
25 every year because she liked to be the center of

1 she was at Big Louie's? I know it's graphic, but
2 tell us what you observed.

3 A. I've never seen her dance on a pole, but
4 there was one stage that she would get on with -- she
5 had one dancer that she liked and she would have that
6 dancer come over on this one stage where it was close
7 to where we were all seated. Like that was the
8 stage, where your two tables are. And she would get
9 up and she'd raise her shirt up and let the dancer
10 raise her shirt up. They would rub their breasts
11 together. They would get down in her face with their
12 thong bottom. All that stuff.

13 Q. Was there anything else that led you to use
14 that term swinger with regard to her?

15 A. Like I said, she had had relations with my
16 husband and I before I started working there. And I
17 don't know that she had experience with other people,
18 I don't know, but she did with Carl and I.

19 Q. Did she ever tell you about anyone else
20 that she had that kind of experience with, to your
21 knowledge?

22 A. No, I don't believe so. Oh, yes. Yeah, I
23 remember.

24 Q. Okay.

25 A. She's had it with Misty Hale, and I think

1 she might have gotten remarried now. I don't know
2 her last name now. Misty Hale and her husband.
3 Stephanie Stilley. Because Misty Hale, she always
4 said she tasted like green onions. That was a big
5 joke.

6 Q. She would say this in the office?

7 A. Yeah.

8 Q. And then who was the other one?

9 A. Stephanie Stilley.

10 Q. Do you know how to spell that, Stilley?

11 A. S-t-i-l-l-e-y.

12 Q. What did she say about Stephanie Stilley?

13 A. That she was no good at it. And in the
14 office, she would tell Christie, "Oh, you've got to
15 let Stephanie go down on you, it's great." I mean,
16 this is real embarrassing. But she would brag and
17 tell me to take Christie back in the back room and
18 show her. Just stuff like that. It was constantly
19 going on in the office. And, no, I never did it in
20 the office.

21 Q. Okay. As I understand it, she would tell
22 Christie that she ought to let you --

23 A. Yeah.

24 Q. -- go down on her?

25 A. Yeah. Oral sex, yeah.

1 Q. Okay. These photographs you mentioned with
2 Mr. Steelman where she had you and Christie pose,
3 were they on a film camera or a digital camera, or do
4 you
5 recall?

6 A. No, they were pictures just with a .35
7 millimeter camera.

8 Q. Did they actually get developed?

9 A. Yeah, I believe so. It was on Monica's
10 film. She took all those pictures with her.

11 Q. Did you ever see the actual pictures that
12 were developed?

13 A. I don't remember if I did or not.

14 Q. Did Monica ever make mention of -- during
15 the time that you were in the office -- of a
16 situation where Christie had gotten a raise?

17 A. Yes, she did mention it.

18 Q. What did she say about that?

19 A. That she didn't like it. It wasn't fair.
20 And Mike tried to make it up to her by buying her a
21 dog that she didn't like, so she gave it back. It
22 was a real sore spot for her. She didn't like it.

23 Q. And as I understood your testimony, you
24 made the reference where if you would ask for help or
25 something, she said you had to expose yourself to

1 her; is that correct?

2 A. That's correct.

3 Q. Did that occur on one occasion, more than
4 one occasion?

5 A. Many occasions. The one time asking for
6 help only happened once, but there was other
7 occasions.

8 Q. Did she ever threaten you with your job if
9 you didn't do it?

10 A. She didn't threaten it at that time, but
11 you knew it was hanging over your head. She let us
12 know regularly it was hanging over our head.

13 MR. HARRIS: I think that's all the
14 questions I have.

15
16 EXAMINATION BY MR. FRANKLIN:

17 Q. Ms. Pounds --

18 A. Uh-huh.

19 Q. -- I introduced myself initially. My name
20 is Corey Franklin. I'm an attorney for Texas County.

21 A. Uh-huh.

22 Q. I have a few questions to ask. The same
23 disclaimer I think Warren had; I apologize we have to
24 get into some sensitive areas. I'll try to be as
25 judicious about it as possible.

1 Anderson.

2 Q. Did she ever describe for you her feelings
3 about Mike Anderson before the time you accepted the
4 job at the prosecutor's office?

5 A. The only thing she said about Mike was that
6 when she come back down here after working in Jeff
7 City, that Mike hired her and they kind of built his
8 business. She helped him build his law firm.

9 Q. Okay.

10 A. So, no, she never said anything bad about
11 him.

12 Q. Did she say anything positive about Mike?

13 A. Yeah, she said they built up this business
14 and she helped him and he was generous with gifts.
15 And she told me at one point he had a big case that
16 he won and he gave her a bonus of so many thousand
17 dollars and he was real good to her that way.

18 Q. Okay.

19 A. And when her dad died, Mike was awesome to
20 her. I mean, he came to the office with -- I mean,
21 the hospital with all of us and he was real good to
22 her, told her she could take as much time off as she
23 needed. He was great to her. He tried to help her
24 out -- you know when somebody dies, how the family
25 pulls apart and they want this and they want that?

1 just me and Christie. And occasionally when Terry
2 would come in, we would all sit around and discuss
3 what happened over the weekend and all what Monica
4 did. I mean, she was the one with the stories.

5 Q. Did other people share their sexual
6 experiences in the course of these discussions with
7 Monica?

8 A. Yeah, we did.

9 Q. Is it fair to say that Monica would
10 initiate these conversations, or would other people
11 initiate these conversations as well?

12 A. Well, probably both. I mean, it wasn't --
13 you know, one of us might come in smiling and happy,
14 "Oh, you had a good weekend," or something. So it's
15 hard to say, really, how it got started.

16 Q. At any point in time during these
17 discussions, did Monica ever say to you or anyone
18 else that she was uncomfortable discussing her sex
19 life or her sexual behavior?

20 A. No.

21 Q. And it's fair to say, I guess, that she
22 encouraged you to describe the details of your sexual
23 relationships with her?

24 A. Oh, yes.

25 Q. And would she tell sexual-related jokes in

1 the office?

2 A. Jokes, yeah. Like you get an email or
3 something with a little joke on it, yeah.

4 Q. And was it in a joking manner or a serious
5 manner when she would tell you to expose your breasts
6 in exchange for assistance with work?

7 A. Well, at first I thought it was a joke, she
8 was just teasing. But it was serious.

9 Q. Did she ever touch you in a sexually
10 inappropriate way within the confines of the Texas
11 County Prosecutor's Office?

12 A. Oh, yeah.

13 Q. What did she do?

14 A. I mean, you know, hugging, grabbing a boob
15 or smacking me on the butt as you walk by. We have a
16 little hallway that we pass through, you know,
17 rubbing up against -- you know, rubbing butts or
18 rubbing the breasts across the back. Things like
19 that.

20 Q. Okay. To your knowledge, other than the
21 occasions when this former forest ranger would come
22 in and change her belly button ring --

23 A. Uh-huh.

24 Q. -- are you aware of any occasions when
25 Monica would undress in the office?

1 A. No, I was not aware of it if it happened.

2 Q. Okay. Are you aware of any occasions when
3 Monica would have sexual content with a visitor --
4 excuse me, sexual contact with a visitor to the
5 office?

6 A. I mean, hugging them, you know. I don't
7 know any more, you know, than that, you know, the
8 flirting, touching them, touchy/feely, smack them on
9 the butt. But, like I said, I was only there part
10 time.

11 Q. Okay. Do you know if Monica ever brought
12 sex toys to the office?

13 A. Yeah, I think we've had them there.
14 Magazines, yeah. Toys, yeah.

15 Q. Pornographic magazines?

16 A. They have the sexual parties, you know,
17 that they sell this --

18 Q. Sex toy parties?

19 A. Yeah, sex toy parties. And, you know,
20 there would be those magazines. Yeah, she ordered
21 some kind of chain outfit that she was ordering. She
22 showed it to us, and then she brought it in and
23 showed it to us all. She didn't try it on and show
24 us, but --

25 Q. She brought it in?

1 when she went to strip clubs with people in the
2 office?

3 A. Oh, yeah. I only went to one of those
4 birthday parties --

5 Q. Uh-huh.

6 A. -- so, you know, they were going on every
7 year at her birthday, so.

8 Q. Did she discuss at any occasions, other
9 than on her birthday, when she would visit strip
10 clubs with people from the office?

11 A. I don't recall.

12 Q. Again, I'm not trying to be indelicate, but
13 it's my understanding from your testimony when you
14 were originally conversing with Mr. Steelman, that
15 during the course of the time that you were employed
16 in the prosecutor's office --

17 A. Uh-huh.

18 Q. -- Monica Daniel asked you to come to her
19 house and have sex with her?

20 A. Yes.

21 Q. Is that accurate?

22 A. Yes.

23 Q. Did you, on occasion, go to her house with
24 her and have sex with her?

25 A. No.

1 Q. Other than the occasion when there was the
2 four of your there?

3 A. All of us.

4 Q. That was the only occasion that you had sex
5 with her during the time that you worked at the
6 prosecutor's office?

7 A. Yes.

8 Q. But it's also accurate to say that you had
9 sexual encounters with her prior to the time that you
10 worked in the prosecutor's office?

11 A. That's correct.

12 Q. In any of those occasions, were there more
13 persons present than you and Monica?

14 A. Present in the house, but not in the same
15 room. We'd all go out to the bars, like down to West
16 Plains, and there was a big group. And they'd stay
17 downstairs and spend the night, you know, but Monica
18 would come upstairs with us.

19 Q. When you say "with us"?

20 A. My husband at the time.

21 Q. Are you aware of whether Monica asked
22 anyone else in the prosecutor's office to have sex
23 with her?

24 A. No, I don't recall.

25 Q. Did you observe Monica inappropriately

1 and told us about it, so. She would tell us that his
2 wife didn't like her, but, of course.

3 Q. So it's your understanding that Kody
4 Lucas's wife found out that Mr. Lucas was having a
5 sexual relationship with Monica Daniel?

6 A. I don't know if she found out or just
7 didn't like the way Monica handled herself around
8 him. I don't know for sure. He was in a band at
9 that time. He wasn't working at the law enforcement
10 at that time.

11 Q. So she was more of a band groupie at that
12 point than a law enforcement groupie at least with
13 respect to --

14 A. Yeah, pretty much, him and the drummer.

15 Q. Who is the drummer?

16 A. Danny Yates.

17 Q. Was he involved in law enforcement in any
18 way?

19 A. No, he was just a drummer.

20 Q. You said that she had a particular
21 infatuation with an attorney. What was that
22 attorney's name?

23 A. Oh, it's on the tip of my tongue. Rolla.
24 Ken Clayton.

25 Q. Did she ever discuss having a sexual

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A. No.

Q. Do you know what they were referring to?

A. No. And, really, I didn't want to know.

Q. Okay. Did Monica ever ask you to join her in a sexual encounter with herself and another man, other than your husband?

A. No.

Q. Did you have a trial in your divorce case?

A. Yeah, we went to court. I did my own divorce.

Q. Okay.

A. We agreed on everything.

Q. At or about the time that Monica was initially terminated by Mike Anderson, do you remember her being subpoenaed to testify in the divorce of Misty and Ron Hale?

A. Yes, I do.

Q. Do you recall her making any comments about her anticipated testimony in that divorce trial?

A. Yeah. She said she wasn't going to tell the truth about her and Misty and Ron having sex.

Q. How did that conversation arise?

A. I was just a participant in the room.

Q. So you were just sitting there?

A. Uh-huh.

1 A. Not that I know of, but my husband was
2 sleeping with everyone. That's why we divorced. I
3 found out that -- like Tiger Woods, I guess, he was
4 addicted. He couldn't stop and he wasn't truthful
5 about it, so I don't know. I was never told that
6 Millie had, but I was told -- I had people call me at
7 the prosecutor's office and tell me of different
8 women, but no one ever said Millie.

9 MR. FRANKLIN: Fair enough. I don't
10 have any additional questions. I'll pass the
11 witness.

12

13 RE-EXAMINATION BY MR. STEELMAN:

14 Q. I've got a couple follow-ups. On this Kody
15 Lucas and Danny Yates, did you say that Monica told
16 you about them?

17 A. Yes.

18 Q. And where did she tell you about them?

19 A. I want to say at the bar, or -- I don't
20 know where. I just remember her telling me about
21 them.

22 Q. And neither of them were in law
23 enforcement; is that right?

24 A. No.

25 Q. Now, Ken Clayton, when did she tell you

1 A. Yes.

2 Q. Okay.

3 MR. STEELMAN: I don't have any other
4 questions.

5

6 RE-EXAMINATION BY MR. HARRIS:

7 Q. Stephanie, I'm trying to be brief. You
8 talked about the flirting that would go on by Monica
9 in the office. Would she ever do that in Mike's
10 presence?

11 A. Probably, but I don't know if Mike would
12 have picked up on it.

13 Q. I mean, you never actually saw it occur
14 when Mike was there?

15 A. No.

16 Q. Okay.

17 A. I mean, if he was there, he was in his
18 office on the phone or working.

19 Q. Did Monica have a tattoo?

20 A. Oh, yeah, she has got several tattoos.

21 Q. Did she ever show her tattoos to people who
22 would come in the office?

23 A. Constantly.

24 Q. Where were her tattoos located?

25 A. The one that she did that she liked to show